Case 1:12-cv-00038-HSO-RHW Document 6 Filed 04/03/12 Page 1 of 39

# Karen Ladner Ruhr

HANCOCK COUNTY CIRCUIT CLERK 152 MAIN STREET, SUITE B BAY ST. LOUIS, MISSISSIPPI 39520

228-467-5265 228-467-5266 228-467-2779 Fax

GULFPORT: 228-868-1913 TOLL FREE: 1-800-771-9942

### CERTIFICATE OF CLERK AS TO CERTIFIED COPY

STATE OF MISSISSIPPI

COUNTY OF HANCOCK

I, Karen Ladner Ruhr, Clerk of the Circuit Court of the said County and State, hereby certify that the foregoing pages contain a true and correct copy of the file from the Circuit Court of said County and State in Cause number 12-0103 Styled: TROUT POINT LODGE LIMITED, A Nova Scotia Limited Company VAUGHN PERRET AND CHARLES LEARY VS DOUG K. HANDSHOE

as the originals of same appear of record and file in my office.

Given under my hand and official seal affixed, this the 28<sup>TH</sup> day of March, 2012.

HANCOCK COUNTY

CIRCUIT CLERK

## IN THE CIRCUIT COURT OF HANCOCK COUNTY

#### STATE OF MISSISSIPPI

TROUT POINT LODGE, LIMITED, A Nova Scotia Limited Company; VAUGHN PERRET and CHARLES LEARY,	MAR 2 6 2012  KAREN LADNER RUHR  CIRCUIT CLEAN, HANCOCK CO.  BY  D.C
Plaintiff,	
v.	) Civil Action No.: 12-0103
DOUG K. HANDSHOE,	)
Defendant.	) )

### NOTICE OF FILING NOTICE OF REMOVAL

Defendant, by its undersigned counsel, hereby gives notice that it has filed a Notice of Removal in the United States District Court for the Southern District of Mississippi in the case styled Trout Point Lodge, Limited, A Nova Scotia Limited Company; Vaughn Perret and Charles Leary v. Doug K. Handshoe, Civil Action No. 12-0103. A copy of the Notice of removal is attached as Exhibit "1".

DATED: March 23, 2012

G. GERALD/CRUNHIRD, Esquire

Mississippi Bar No. 7926 G. GERALD CRUTHIRD, P.A.

Attorneys at Law P. O. Box 1056

121 Fourth Street

Picayune, MS 39466 Telephone: (601) 798-0220

Facsimile: (601) 798-4591

Email: ggeraldc@bellsouth.net

**COUNSEL FOR DEFENDANT** 

### **CERTIFICATE OF SERVICE**

I hereby certify I have mailed (via U.S. Mail) a copy of the foregoing Notice of Filing Notice of Removal to the following:

Henry Laird, Esquire
Mississippi Bar No. 1774
Jones, Walker, Waechter, Poitevent,
Carrere & Denegre, LLP
2510 14<sup>th</sup> Street, Suite 1125 (39501)
Post Office Drawer 160
Gulfport, MS 39502
Telephone: (228) 864-3094
Facsimile: (228) 864-0516

Facsimile: (228) 864-0516 Email: <u>hlaird@joneswalker.com</u>

Attorneys for Plaintiff

THIS the  $2\sqrt{\frac{1}{6}}$  day of March, 2012.

G. GERALD CRUTHIRD

FOR THE SOUTHE	STATES DISTRICT COURT FILED  ERN DISTRICT OF MISSISSIPP THERN DIVISION  SOUTHERN DISTRICT OF MISSISSIPP MAR 2 6 2012  LY MOBUN CLERK DEPUTY
TROUT POINT LODGE, LIMITED,	)
A Nova Scotia Limited Company;	)
VAUGHN PERRET and	)
CHARLES LEARY,	)
	)
Plaintiff,	)
v.	Civil Action No.: 1.12CV90 LG-JMR
DOUG K. HANDSHOE,	j
Defendant.	) )

### DEFENDANT'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1441 et seq., Defendant, Doug K. Handshoe, files this Notice of Removal of the Civil Action filed against him by Plaintiffs, Trout Point Lodge, Limited, Vaughn Perret and Charles Leary, and states as follows:

- 1. On March 8, 2012, Plaintiffs' filed their Motion to Enroll Foreign Judgment in the lawsuit styled *Trout Point Lodge, Limited, A Nova Scotia Limited Company; Vaughn Perret and Charles Leary v. Doug K. Handshoe*, Civil Action No. 12-0103, in the Circuit Court of Hancock County, Mississippi.
- 2. The Defendant, Doug K. Handshoe, was served with notice of such filing on or about March 9, 2012.
- 3. Removal is proper under 28 U.S.C. § 4103, because Plaintiffs' suit involves a Federal question. Specifically, Plaintiffs have alleged defamation via the internet by Defendant in securing rendition of a foreign judgment against Defendant in the Supreme Court of Nova

Scotia, Canada on or about February 2, 2012; and in response thereto Defendant has filed his suit in this Court, styled Slabbed New Media, LLC, a Mississippi LLC, Douglas Handshoe vs. Trout Point Lodge, Limited, a Foreign Limited Company; Charles Leary and Vaughn Perret, Civil Action No. 1:12-CV-00038-RHW, filed in the United States District Court for the Southern District of Mississippi, Southern Division, under the provisions of the Securing The Protection Of Our Enduring and Established Constitutional Heritage Act, pursuant to 28 U.S.C. Sections 4101, et seq.

- 4. Venue is proper in this district under 28 U.S.C. § 1441(a) because the State Court where the action has been pending is located in this district.
- 5. This Notice is being filed with this Court within thirty (30) days after Defendant received a copy of Plaintiffs' initial pleading, Motion to Enroll Foreign Judgment.
- 6. Defendant would further show that true and correct copies of all process, pleadings and orders filed to date in the above described State Court action are attached hereto as Exhibit "A"; and that no other process, pleadings, or orders have been served upon Defendant to date in this action.
- 7. Defendant files this Notice without waiving any defenses to the claims asserted by Plaintiff or conceding that Plaintiffs' above described foreign judgment can be enrolled or enforced.
- 8. Defendant is filing contemporaneously with this Notice, a Notice of Filing Notice of Removal with the Clerk of the Circuit Court of Hancock County, Mississippi, informing the Clerk that this action is being removed. A copy of said Notice of Filing Notice of removal is attached as Exhibit "B".

Defendant prays that this Court take jurisdiction of this action to its conclusion, to the exclusion of any further proceedings in the State Court in accordance with the law. Defendant also prays for such other and further relief to which it may be justly entitled.

DATED: March 23, 2012

Respectfully Submitted,

G. GENALD CRUTHIRD, Esquire

Mississippi Bar No. 7926

G. GERALD CRUTHIRD, P.A.

Attorneys at Law P. O. Box 1056

121 Fourth Street

Picayune, MS 39466

Telephone: (601) 798-0220 Facsimile: (601) 798-4591 Email: ggeraldc@bellsouth.net

**CO-COUNSEL FOR DEFENDANT** 

JACK E. "BOBBY" TRUITT, Esquire

The Truitt Law Firm, L.L.C. 149 North New Hampshire Street

Covington, LA 70433-3235

Telephone: (985) 327-5266 Facsimile: (985) 327-5252

Mobile: (985) 778-1973 Email: btruitt@truittlaw.com

CO-COUNSEL FOR DEFENDANT, APPEARING PRO HAC VICE

### **CERTIFICATE OF SERVICE**

I hereby certify I have mailed (via U.S. Mail) a copy of the foregoing Defendant's Notice of Removal to the following:

Henry Laird, Esquire
Mississippi Bar No. 1774
Jones, Walker, Waechter, Poitevent,
Carrere & Denegre, LLP
2510 14<sup>th</sup> Street, Suite 1125 (39501)
Post Office Drawer 160
Gulfport, MS 39502
Telephone: (228) 864-3094
Facsimile: (228) 864-0516

Facsimile: (228) 864-0516 Email: hlaird@joneswalker.com

Attorneys for Plaintiff

and have hand delivered a true and correct copy unto

Karen Ladner Ruhr Circuit Clerk of Hancock County, Mississippi 152 Main Street, Suite B Bay St. Louis, MS 39520

THIS the  $\frac{26}{100}$  day of March, 2012.

G. GERALD CRUTHIRD

### CERTIFICATE OF CLERK

STATE OF MISSISSIPPI

### COUNTY OF HANCOCK

1, Karen Ladner Ruhr, Circuit Clerk of the said County and State, hereby certify that the foregoing pages contain a true and correct copy of the complete file in Cause No.

12-0103 styled Trout Point Lodge et al versus Doug K. Handshoe as appears on file in my office this date.

Given under my hand official seal affixed, this the 14th day of March, 2012.

KAREN LADNER RUHR

CIRCUIT CLERK

HANCOCK COUNTY, MS

EXHIBIT ''A''

# IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI

TROUT POINT LODGE, LIMITED, A Nova Scotia Limited Company; VAUGHN PERRET and CHARLES LEARY

**PLAINTIFFS** 

**VERSUS** 

CAUSE NO: \_12-0103

DOUG K. HANDSHOE

DEFENDANT

# MOTION TO ENROLL FOREIGN JUDGMENT

COME NOW Plaintiffs/Judgment Creditors, Trout Point Lodge, Limited, Vaughn Perret and Charles Leary, and file this their Motion to Enroll Foreign Judgment against Defendant/Judgment Debtor, Doug K. Handshoe, and in support thereof would submit a true and correct copy of the Judgment as Exhibit "A" and the Affidavit of Henry Laird as Exhibit "B".

Respectfully submitted, this the 8th day of March, 2012.

Trout Point Lodge, Limited, Vaughn Perret and Charles Leary, Yudgment Creditors

MAR 0 8 2012

# CERTIFICATE OF SERVICE

I, Henry Laird, do hereby certify that I have this day mailed by United States mail, postage prepaid, a true and correct copy of the foregoing Motion to Enroll Foreign Judgment to the following:

Doug K. Handshoe 345 Carroll Avenue Bay St. Louis, Mississippi 39520

This the 8th day of March, 2012.

Henry Land MSB# 1774

Jones, Walker, Waechter, Poitevent,

Carrère & Denègre, LLP

2510 14th Street, Suite 1125 (39501)

Post Office Drawer 160

Gulfport, MS 39502

Telephone: (228) 864-3094 Facsimile: (228) 864-0516

Email: hlaird@joneswalker.com

2011

IF THE SUPREME COURT OF NOVA SCOTTA EIETWEEN:

Tripot Bolint Lodge Islaminal, a Nova Sco in Limited Company, Vaughn Parret & Charles Leary

- and -

Doug K. Handshos and Jary Dos

Defendants

7a.80,350

CROEN

Relative the Honourable Justice Suzanne Hood in charables:

of motion was made by Trout Point Lodge, Charles Leary, and Veoghan Paccet for assessment of damages and injunctive relief against Doug K. Handshoe.

Having reviewed the affidavits of Charles Leary and Vaughan Parret, and having heard Charles Leary and Vaugnan Perret on behalf of the Plaintiffs in charrours, on the motion of Trout Point Lodge, Charles Leavy, and Vaughn Perret the following is ordered:

The Defendant Douglas K Handshoe of Mississippi as a joint and concurrent tortfeasor shall

pay to the plaintiffs the following damages:

to Trout Point Lodge; \$75,000 in general dameces

to Vaughan Perret, \$100,000 in general damages; \$50,000 in aggravated damaged; and \$25,000 in puntive damages;

to Chartes Leavy, \$100,000 in general damages; \$50,000 in aggravated damage4; and \$25,000 in punitive damages;

as well 35 costs of \$2,000.

In addition, I order a permanent injunction to issue against the Effendant, Douglas X.  $H_{\rm End} shc_2, restraining \ him \ from \ disseminating, posting \ on \ the \ Internet \ or \ publicating, in \ say \ resources$ whatscover, directly or indirectly, any statements or costs enist about the plain life, Trout Point Louge, Charles L. Leary, and Vaughan J. Perret. This injunction shall include the publication, circulation and promotion on the plog named Stabbed, and any similar or other publications. For further particularly, re defendant shall not publish or cause to be published or otherwise disservinete or distribute in m rmanner whatspever, whether by way of the Internet or other medium, any statement's or other computations which refer to the plaintiffs by name, depiction or description.

I riso grade a mindatory injunction to issue against the shove-har and defauld at migar ling continued. publication is any attained whatsoever, whether by why of the internal or other medium, my space and

> IN THE SUPPLEME COUPT OF MOVA SOCIAL i hereby certify that the foregring accoment is a true copy of the original.

DEED TWO TED DOWN & C.

Prafficaular. Elegine - greations are End: protect

FYEIRE

别有政治

## Case 1:12-cv-00038-HSO-RHW Document 6 Filed 04/03/12 Page 12 of 39

the first call which constraints the plaintifful by natural depth from or discription. All such material is here the ordered to be immediately removed from publication.

Issued Felyman in 2012

្នុំត្នាទៅno ទាγ

## IN THE CERCUIT COURT OF HANCOCK COUPER, MISSISSIPPI

TROUT POINT LODGE, LIMITED, A No Limited Company; VAUGEN PERRET as CHARLES LEARY		PLAINTIFFS
VERSUS	CAUSE NO:	
DOUG K. HANDSHOE		DEFENUANT
AFFIDAVIT (	OF HENRY LAIRD	
WARRING TO THE PARTY OF THE PAR	And the second s	

STATE OF MISSISSIPPI COUNTY OF HARRISON

PERSONALLY APPEARED BEFORE ME the undersigned authority for the County and State aforesaid the within named Henry Laird of Jones, Walker, Whechter, Pointevent, Carrère & Denègre, LLP, says the following things are true:

- 1. He makes this Affidavit on personal knowledge, representations of the Plaintiffs and upon the Order entered February 2, 2012 in the Supreme Court of Nova Scotia styled: Trout Point Lodge, Limited, a Nova Scotia Limited Liability Company, Vaughn Perret & Charles Leary and Doug K. Handshoe and Jane Doe, Yar. No: 353654.
- 2. Attached hereto as Exhibit "A" is a true, correct and certified copy of the Judgment in favor of "rout Point Lodge, Limited, Vaughn Perret & Charles Leary against Doug K. Handshoe.
- The name of the judgment debtor in the above styled case is Doug K. Harbite, and last known post office address is 345 Carroll Avenue, Bay St. Louis, Mississippi 19520. The post office address of the judgment creditors, Trout Point Lodge, Charles Leary and Vauglia for est, is 139 Trout Point Road, Kemptville, NS BOW 1Y0 Canada.

EXHIBIT
"B"

(GP000691.1)

## Case 1:12-cv-00038-HSO-RHW Document 6 Filed 04/03/12 Page 14 of 39

or other communications, which refer to the plaintiffs by no(a,C) piction or description. All  $s_{a}(b)$ middrial is haraby ordered to be immidiately removed from publication.

issues Flittlen d. 2012

### CENTERICATE OF SETY!CE

I, Ferry Laint, do hereby certify that I have this day milled by United States mail, postage property, a true and correct copy of the foregoing Motion to Erroll Foreign Judgment to the following:

Doug K. Handshoe 345 Carroll Avenue Bay St. Louis, Mississippi 39520

This the 8th day of March, 2012.

Henry Layd MSB# 1774

Jones, Walker, Waechter, Politevent,

Carrère & Denègre, LLP

2510 14th Street, Suite 1125 (39501)

Post Office Drawer 160 Gulfport, MS 39502

Telephone: (228) 864-3094 Facsimile: (228) 864-0516

Email: hlaird@joneswalker.com

1011

# IN THE SUPREME COURT OF NOV A SCOTTA BETWEEN:

Trout Point Lodge, Ulmited, a Nova Scotia Limited Company, Vaughn Perret & Charles Leary

- and -

Doug K. Handshoe and Jane Doe

Defendants

ORDER

efore the Honourable Justice Suzanne Hood in chambers:

Yymotion was made by Tmut Point Lodge, Charles Leary, and Vaughan Perret for essessment of Samages and Injunctive relief against Doug K. Handshoe.

Having reviewed the affidavits of Charles Leary and Vaughan Perret, and having heard Charles Leary and Vaughan Perret on behalf of the Plaintiffs in charmers, on the motion of Trout Point Lodge, Charles Leary, and Vaughan Perret the following is ordered:

The Defendant Douglas K Handshoe of Mississippi as a joint and concurrent tortleasor shall

pay to the plaintiffs the following damages:

to Trout Point Lodge: \$75,000 in general damages

to Vaughan Perret, \$100,000 in general damages; \$50,000 in aggravated damaged; and \$25,000 in punitive damages;

to Charles Leary, \$100,000 in general damages; \$50,000 in aggravated damage4; and \$25,000 in punitive damages;

as well as costs of \$2,000.

In addition, I order a permanent injunction to issue against the defendant, Douglas A. Handshoe, restraining him from disseminating, posting on the Internet or publishing, in any count of whatsoever, directly or indirectly, any statements or comments about the plaintiffs, Trout Point Lodge, Charles L. Leary, and Vaughan J. Perret. This injunction shall include the publication, circulation and promotion on the blog named Slabbed, and any similar or other publications. For further publications, the delendant shall not publish or cause to be published or otherwise disserminate or distribute in any manner whatsoever, whether by way of the Internet or other medium, any statements or other communications which refer to the plaintiffs by name, depiction or description.

I also order a mandatory injunction to issue against the above-named. Defendant regarding construed publication in any manner whatsoever, whether by way of the Internet or other medium, any statements.

IN THE SUPREME CONTROL OF NO IA SOUTHAN thereby certify that the foregoing document is a true copy of the original.

Dated 7\_day ci\_12h

Prothonutary

Elaine L. d'Entrement

Prothonotary

EXHIBIY F

(VI)

57	U.S. Postal S CERTIFIED (Comestic Mail O	MAIL			ilded)
급	For delivery information	ition visit our	websile at u	ww.usps.co	ome
	OFF	ICI	AL		
512	Postage	\$	SAINTL	OU,C.	>+1:C>4:34:44
	Cartified Foo	\@\	-	7 A (N) (A)	(12)
מממם	Return Receipt Fee (Endorsement Required)		MAR	Posimi 9 " Hiere	1.5.25
70 5	Restricted Delivery Fea (Endorseme vi Required)			/4	
Д. Т-	Total Postage & Fees	\$	30520 U	SPC.	
מעטצ	Sireel Apr. No.	Han	Dako	a. Cun	
•	Chy, State, 1994	11.3	Ques	MS E	39520
	PS Form 3800 Augus, 2	806	Se	e Briverse le	instructions

MAR 12 2012

MAR 12 2012

KAREN LADNER RUHH

CHROUIT OLERK, HUNDOCK OC.

212

COMES 5	HEET	Court Identification D	ocket 2	Caretter Care	Occk	et Number
टीओं Case Sti	ay Roca:	772 17	Z ST	12 19 / 12	7710	
( Liber Janon te 1 by	**	County 1 Indicate	Countrib			
Prior to Filing of		Olania j	Marin Marin			
	, , , , , , , , , , , , , , , , , , , ,	DIZ OLD	1912)	A CONTRACTOR OF THE PROPERTY O		Estal Pocker ID
1	r . 100/01		3 Same			A CONTRACTOR OF THE CONTRACTOR
ik i si sippi Supreme Court	Form AOC/01	■ 新沙田 新田 日本	marking dark		Two Number of B	Marin 1/1/94
Administrative Office of Courts	(Rev 2009)	*	Charles Charles IV.	Annual Martin State Company of the C	Judicial Cla	
In the CIRCL		Court of HANCOCK		County —	360(60) 56	
Origin of Suit (Place an "X" in	• • • • • • • • • • • • • • • • • • • •	[ ] Foreign Judgment En	rolled	Transfer from Other	court	[T] Uther
Initial Filing Remanded	Reinstated Reopened	Joining Suit/Action	TOTICA	Appeal	2.72414	\
Plaintiff - Party(les) Initially 8	Lucal .		Misional Plain			
f	suidiuk zair zuonia a	e entereu rirst - enter Ac	igittoriai Frati	Mile Ott Belgarade Com		
	t Name	First Name		Maiden Name, if applic	table M.I.	Jr/Sr/It:/IV
				x) of an Estate, and enter style		
Check (x) if Individua	al Planiti., is acting in car	pacity as Business Owner/Op	erator (d/b/a)	or State Agency, and enter en	tity	
D/3/A or Agency						
Business Trout Point Lodge.	l td.					
Eı	iter legal name of busine	ess, corporation, partnership	, agency - If Co	rporation, indicate the state s	where incorporate	d
Check (x) if Business	Planitiff is filing suit in t	he name of an entity other t	han the above,	and enter below:		
0/3//	يا يول پېښېون او د پېښې پېښې پېښې پېښې د پېښې پېښې پېښې					
Audress of Plaintiff 189 Trou	t Point Raad, Kemp	ville, NS B0W 1Y0 Car	ada		******	
Actorney (trame & Address) He	enry Laird Post Offi	ce Box 160, Gulfport, N	IS 39502		MS Bar No.	1774
Check ( x ) if Individua	l Filing hitial Pleading is	NOT an attorney				
Signature of Individual Filin			***************************************	وملك والمساح المراجع والمراجع والمساحد والمساحد والمساحد والمراجع والمراجع والمراجع والمراجع والمراجع والمراجع		
Defendant - Name of Defenda	nt - Enter Addition	Defe dants on Separate	Form			
Individual Handshoe	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Oug			К	
Last	Name	First Name	Market, samparapapakan	Maiden Name, if applic		Jr/Sr/m/i*/
			Administrator(	rix) of an Estate, and enter st	yle:	
Estate of 345 Car	roli Avenue, Bay St.	Louis, MS			antitus	<del></del>
	Defendant is acting in o	apacity as Business Owner/C	operator (d/b/	a) or State Agency, and enter	entay.	
D/8/A or Agency	···				***************************************	
Business	les level arms of busins	co cococration partnership	agency - If Con	poration, indicate the state w	here incorporated	1
Check ( x ) if flusiness (	ter regar name or ounte Defendant is acting in th	e name of an entity other th	an the above, a	and enter below:		
NA 12						
Mistry . Her A A Plate of a If Kr					MS 3ar No.	
Compen	-0.40.	Punitive S	Andreader of the officer of the State of State o	Check (x) if child support i	s contemplated 2	s an issue in this suit."
िल्लाबहुर्ड Southt: Compen	Satory Q		lease submit co	ampleted Child Support Infor		
Nature of Suit (Place an "X" in		والمنافئة		Minore Non-Domestics		e Recoperty
Ly Ogmatic Relations		ess/Commercial:	, married	tion - Contested	in	e Possession
Child Custody/Visitation		ting (Business)	· ·	otion - Uncontested ent to Abortion Minor	☐ Ejectni	ent at Domain
Crild Support	<u></u>	ss Dissolution ollection	<b></b>	eval of Minority	Evictio	- 1
Divo ce:Fault	Employ		Othe	•	<u>'</u>	l Foreclosure
Divorce: Irreconcilable Diff.		Judgment		Civil Roads		ser*ian
Donnestic Acres	Garnish		Elect		Partitle Tay Sat	on e: Confirm, Carriel
€: ancipation	Replevi	n		ngement as Corpus		oundary or Easement
Hadification Palernics		Riobate and Table		Conviction Relief/Prisoner	Other_	
2: pperty Division	Accoun	ting (Probate)	Othe			APPORT OF THE PARTY OF THE PART
Separate Maintenance	المسما	rtificate Correction		Control	Bad Fai	CD .
Termination of Parental Right			i	th of Contract	☐ Frand ☐ Loss of	Consortium
Ulf34 (est 7/1/97; formerly to ther	I;(ESA) Conserv	atorship nshio	Insta			ctice · Lagal
Accessor to		•		fic Performance	٠ رست	ctice - N'adical
Administrative Agency	Intestat		Other		M 455 T	1
County Const		Settlement		Stationes/Rules = Station		nce General
Hardchip Petition (Oriver Lice		nt of Title	i	Validation	L	nce - Motor Vehicle
Justice Court  MS Dept Employment Securit	Name Cl y Testate	-	L3	orfeiture ratory Judgment	Subroga	• •
Worker's Compensation	Will Con		i i i i i i i i i i i i i i i i i i i	tion or Restraining Order	· · · ·	ul Death
<del></del>	- Limit		Other		Cther_	1
Other	Other_					· · · · · · · · · · · · · · · · · · ·

FUELTHER THIS AFFIANT SAYETH NOT.

HENRY LAIRD

NOTARY PUBLIC 102-16491 Commission Espera April 2, 2013

SWORN TO AND SUBSCRIBED before me, this the Oday of March, 2012.

Notery Pub.

My Commission Expires:

FUELTEER OF IS AFFIANT SAYE TH NOT.

HENRY LAIRD

NOTARY PUBLIC ID:: 16491 Committee Espens

POISON COU

SWORN TO AND SUBSCRIBED before me, this the Oday of March, 2012.

Notary Publis

My Commission Expires:

#### IN THE CIRCUIT COURT OF HANCOCK COUNTY

#### STATE OF MISSISSIPPI

TROUT POINT LODGE, I	LIMITED,	)	
A Nova Scotia Limited Con	npany;	}	
VAUGHN PERRET and		)	
CHARLES LEARY,		)	
		)	
	Plaintiff,	)	
		)	
v.		)	Civil Action No.: 12-0103
		)	
		)	
DOUG K. HANDSHOE,		)	
		)	
	Defendant.	)	

### NOTICE OF FILING NOTICE OF REMOVAL

Defendant, by its undersigned counsel, hereby gives notice that it has filed a Notice of Removal in the United States District Court for the Southern District of Mississippi in the case styled Trout Point Lodge, Limited, A Nova Scotia Limited Company; Vaughn Perret and Charles Leary v. Doug K. Handshoe, Civil Action No. 12-0103. A copy of the Notice of removal is attached as Exhibit "1".

DATED: March 23, 2012

G. GERALD CRUTHIRD, Esquire

Mississippi Bar No. 7926 G. GERALD CRUTHIRD, P.A.

Attorneys at Law P.O. Box 1056 121 Fourth Street Picayune, MS 39466

Telephone: (601) 798-0220 Facsimile: (601) 798-4591 Email: ggeraldc@bellsouth.net

COUNSEL FOR DEFENDANT

EXHIBIT  $n_{R^{11}}$ 

## **CERTIFICATE OF SERVICE**

I hereby certify I have mailed (via U.S. Mail) a copy of the foregoing Notice of Filing Notice of Removal to the following:

Henry Laird, Esquire
Mississippi Bar No. 1774
Jones, Walker, Waechter, Poitevent,
Carrere & Denegre, LLP
2510 14<sup>th</sup> Street, Suite 1125 (39501)
Post Office Drawer 160
Gulfport, MS 39502
Telephone: (228) 864-3094
Faccinile: (228) 864-0516

Facsimile: (228) 864-0516
Email: hlaird@joneswalker.com

Attorneys for Plaintiff

THIS the  $\frac{2}{\sqrt{1}}$  day of March, 2012.

G. GERALD CRUTHIRD

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.  ■ Print your name and address on the reverse so that we can return the card to you.  ■ Attach this card to the back of the mailpiece, or on the front if space permits.  1 Article Addressed to: /2 - 0/03  Addressed to: /2 - 0/03	A. Signature  X
Bay St Jours, MS 39520	3. Service Type  ☐ Certified Mail ☐ Registered ☐ Insured Mail ☐ C.O.D.  4. Restricted Delivery? (Extra Fee) ☐ Yes
2. Article Number 7010 1470 0001  (Transfer from se	103505.03.M-1540

FILED

MAR 2 0 2012

KAREN LADNER RUHR CIRCUT CLERK, HANCOCK CO BY

52	U.S. Postal S CERTIFIED (Domestic Mail C	O MAIL Inly; No Insu	rance Cove	erage Provid	
<u>-</u> -	For delivery inform	ation visit our	website at w	ww.usps.con	n.
<u></u>	OFF	ICI	AL		A sure
<b>645</b>	Postage	\$	SAINTL	OUIC _	
	Certified Fee	\Q	•	14)\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	
0007	Return Receipt Fee (Endorsement Required)		MAR D	Postmark O Here	
	Restricted Delivery Fee (Endorsement Required)			/	
1470	Total Postage & Fees	\$	~30520 US	pe.	
7010	Sireel, Apt. No.;	Han	Daha	re.	
[~	City, State, 129-4	11.	ous	Cecu.	9520
	PS Form 3800 Augus, 20	006	Six	e Reveise for tr	structions

MAR 12 20:2

KAREN LADNER RUHR
CIROUITCLERK, HANCOCK CO.
BY

### IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI

TROUT POINT LODGE, LIMITED, A Nova Scotia Limited Company; VAUGHN PERRET and **CHARLES LEARY** 

**PLAINTIFFS** 

**VERSUS** 

CAUSE NO: 12-0103

DOUG K. HANDSHOE

DEFENDANT

### CLERK'S NOTICE OF FILING FOREIGN JUDGMENT

Take notice that the Circuit Clerk of Hancock County, Mississippi has enrolled a judgment in favor of Plaintiffs/Judgment Creditors, Trout Point Lodge, Limited, Vaughn Perret and Charles Leary, whose post office address is 189 Trout Point Road, Kemptville, NS BOW 1Y0 Canada and whose attorney is Henry Laird of the law firm of Jones, Walker, Waechter, Poitevent, Carrère & Denègre, LLP, located at 2510 14th Street, Gulfport, Mississippi. The Defendant/Judgment Debtor is Doug K. Handshoe whose last known post office address is 345 Carroll Avenue, Bay St. Louis, Mississippi 39520, and this Notice of Filing Foreign Judgment is being mailed by the Hancock County, Mississippi Circuit Clerk to that address.

A true and correct copy of the Foreign Judgment is attached hereto as Exhibit "A".

This the  $\mathcal{B}^{\mathcal{L}}$  day of March, 2012.

2011

DAMA DC



Trout Point Lodge, Limited, a Nova Scotia Limited Company, Vauchn Perret & Charles Leary

- and -

Doug K. Handshoe and Jane Doe

Defendants

FEB 0 2 2012

Plaintiff H JUSTY

ORDER

prore the Honourable Justice Suzanne Hood in chambers:

Amotion was made by Trout Point Lodge, Charles Leary, and Vaughan Perret for assessment of damages and injunctive relief against Doug K. Handshoe.

Having reviewed the affidavits of Charles Leary and Vaughan Perret, and having heard Charles Leary and Vaughan Perret on behalf of the Plaintiffs in chambers, on the motion of Trout Point Lodge, Charles Leary, and Vaughn Perret the following is ordered:

The Defendant Douglas K Handshoe of Mississippi as a joint and concurrent tortfeasor shall

pay to the plaintiffs the following damages:

to Trout Point Lodge: \$75,000 in general damages

to Vaughan Perret, \$100,000 in general damages; \$50,000 in aggravated damaged; and \$25,000 in punitive damages;

to Charles Leary, \$100,000 in general damages; \$50,000 in aggravated damaged; and \$25,000 in punitive damages;

as well as costs of \$2,000.

In addition, I order a permanent injunction to issue against the defendant, Douglas K. Handshoe, restraining him from disserninating, posting on the Internet or publishing, in any manner whatsoever, directly or indirectly, any statements or comments about the plaintiffs, Trout Point Lodge, Charles L. Leary, and Vaughan J. Perret. This injunction shall include the publication, circulation and promotion on the blog named Slabbed, and any similar or other publications. For further particularity, the defendant shall not publish or cause to be published or otherwise disseminate or distribute in any manner whatsoever, whether by way of the Internet or other medium, any statements or other communications which refer to the plaintiffs by name, depiction or description.

I also order a mandatory injunction to issue against the above-named. Defendant regarding continued publication in any manner whatsoever, whether by way of the Internet or other medium, any statements.

IN THE SUPREME COURT OF NOVA SCOTIA i hereby certify that the foregoing document is a true copy of the original.

Dated 7 day of Teleplany

Prothonotary

glaine L. d'Entremont

EXHIBIT

"A"

## Case 1:12-cv-00038-HSO-RHW Document 6 Filed 04/03/12 Page 27 of 39

or other communications which refer to the plaintiffs by name, depiction or description. All such material is hereby ordered to be immediately removed from publication.

Issued February 2.2012

Prothonotary

Elaine L. d'Entremont
Prothonotary

### IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI

TROUT POINT LODGE, LIMITED, A Nova Scotia Limited Company; VAUGHN PERRET and CHARLES LEARY

**PLAINTIFFS** 

**VERSUS** 

CAUSE NO: <u>12-0103</u>

DOUG K. HANDSHOE

**DEFENDANT** 

#### MOTION TO ENROLL FOREIGN JUDGMENT

COME NOW Plaintiffs/Judgment Creditors, Trout Point Lodge, Limited, Vaughn Perret and Charles Leary, and file this their Motion to Enroll Foreign Judgment against Defendant/Judgment Debtor, Doug K. Handshoe, and in support thereof would submit a true and correct copy of the Judgment as Exhibit "A" and the Affidavit of Henry Laird as Exhibit "B".

Respectfully submitted, this the 8th day of March, 2012.

Trout Point Lodge, Limited, Vaughn Perret and

Charles Leary, Vudgment Creditors

By:

Henry Lairy, Mississippi Bar No. 1774

FILED

MAR 0 8 2012

KAREN LADNER RUHR CIRCUIT CLERK, HANCOCK CO. D.C.

{GP000720.1}

### CERTIFICATE OF SERVICE

I, Henry Laird, do hereby certify that I have this day mailed by United States mail, postage prepaid, a true and correct copy of the foregoing Motion to Enroll Foreign Judgment to the following:

Doug K. Handshoe 345 Carroll Avenue Bay St. Louis, Mississippi 39520

This the 8th day of March, 2012.

Henry Lard MSB# 1774

Jones, Walker, Waechter, Poitevent,

Carrère & Denègre, LLP

2510 14th Street, Suite 1125 (39501)

Post Office Drawer 160 Gulfport, MS 39502

Telephone: (228) 864-3094 Facsimile: (228) 864-0516

Email: hlaird@joneswalker.com

2011

IN THE SUPREME COURT OF NOVA SCOTIA
BETWEEN:

Trout Point Lodge, Limited, a Nova Scotia Limited Company, Vaughn Perret & Charles Leary

- and --

Doug K. Handshoe and Jane Doe

Defendants

FEB 0 2 2012

Plaintiffe JUSTIC

Yar. No. 3536

ORDER

Before the Honourable Justice Suzanne Hood in chambers:

Amotion was made by Trout Point Lodge, Charles Leary, and Vaughan Perret for assessment of damages and injunctive relief against Doug K. Handshoe.

Having reviewed the affidavits of Charles Leary and Vaughan Perret, and having heard Charles Leary and Vaughan Perret on behalf of the Plaintiffs in chambers, on the motion of Trout Point Lodge, Charles Leary, and Vaughn Perret the following is ordered:

The Defendant Douglas K Handshoe of Mississippi as a joint and concurrent tortfeasor shall

pay to the plaintiffs the following darrages:

to Trout Point Lodge: \$75,000 in general damages

to Vaughan Perret, \$100,000 in general damages; \$50,000 in aggravated damaged; and \$25,000 in punitive damages;

to Chartes Leary, \$100,000 in general damages; \$50,000 in aggravated damages; and \$25,000 in punitive damages;

as well as costs of \$2,000.

In addition, I order a permanent injunction to issue against the defendant, Douglas K. Handshoe, restraining him from disseminating, posting on the Internet or publishing, in any manner whatsoever, directly or indirectly, any statements or comments about the plaintiffs, Trout Point Lodge, Charles L. Leary, and Vaughan J. Perret. This injunction shall include the publication, circulation and promotion on the blog named Stabbed, and any similar or other publications. For further particularity, the defendant shall not publish or cause to be published or otherwise disseminate or distribute in any manner whatsoever, whether by way of the Internet or other medium, any statements or other communications which refer to the plaintiffs by name, depiction or description.

I also order a mandatory injunction to issue against the above-named. Defendant regarding continued publication in any manner whatsoever, whether by way of the Internet or other medium, any statements

IN THE SUPREME COURT OF NOVA SCOTIA i hereby certify that the foregoing document is a true copy of the original.

Dated 7 day of telemany,

Prothonotary

Elaine L. d'Entremont

EXHIBIT

"A"

NOVA SCOTIVE TO THE PART OF TH

ond.

## Case 1:12-cv-00038-HSO-RHW Document 6 Filed 04/03/12 Page 31 of 39

or other communications which refer to the plaintiffs by name, depiction or description. All such material is hereby ordered to be immediately removed from publication.

Issued February 2, 2012

\_\_\_\_

Elaine L. d'Entremont Prothonctary

Prothonotary

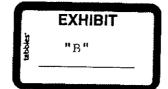
### IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI

AFFIDAVIT	OF HENRY LAIRD	
DOUG K. HANDSHOE		DEFENDANT
VERSUS	CAUSE NO:	
Limited Company; VAUGHN PERRET as CHARLES LEARY	PLAINTIFF	

STATE OF MISSISSIPPI COUNTY OF HARRISON

PERSONALLY APPEARED BEFORE ME the undersigned authority for the County and State aforesaid the within named Henry Laird of Jones, Walker, Waechter, Poitevent, Carrère & Denègre, LLP, says the following things are true:

- 1. He makes this Affidavit on personal knowledge, representations of the Plaintiffs and upon the Order entered February 2, 2012 in the Supreme Court of Nova Scotia styled: *Trout Point Lodge, Limited, a Nova Scotia Limited Liability Company, Vaughn Perret & Charles Leary and Doug K. Handshoe and Jane Doe*, Yar. No: 353654.
- 2. Attached hereto as Exhibit "A" is a true, correct and certified copy of the Judgment in favor of Trout Point Lodge, Limited, Vaughn Perret & Charles Leary against Doug K. Handshoe.
- 3. The name of the judgment debtor in the above styled case is Doug K. Handshoe, and last known post office address is 345 Carroll Avenue, Bay St. Louis, Mississippi 39520. The post office address of the judgment creditors, Trout Point Lodge, Charles Leary and Vaughn Perret is 189 Trout Point Road, Kemptville, NS BOW 1Y0 Canada.



{GP000691.1}

FURTHER THIS AFFIANT SAYETH NOT.

HENRY LAIRD

NOTARY PUBLIC IOD 46491 Commission Expres

April 2, 26:13

PRISON COUR

SWORN TO AND SUBSCRIBED before me, this the day of March, 2012.

Notary Public

My Commission Expires:

			在1990年的1990年,1990年,1990年,1990年,1990年,1990年,1990年,1990年,1990年,1990年,1990年,1990年,1990年,1990年,1990年,1990年,1990年,1	
' COVER SHE	El I	Court Identification Do	icket # Case Year	Docket Number
Civil Case Filing	Earm			
1				
(To be completed by Atto	970	nikalikasi (1965)	ount ID	
Prior to Filing of Ple	ading)	District (C	(/ G, CO)	Local Docket ID
	ua.	BROBI		
Mississippi Supreme Court	Form AOC/01	Month Date		
Administrative Office of Courts	(Rev 2009)	This area to be complet		ase Number if filed prior to 1/1/94
			•	Judicial District
In the CIRCUIT		Court of HANCOCK	County	Indicial District
Origin of Suit (Place an "X" In on			Transfer from Other	court Other
Initial Filing	Reinstated [	Foreign Judgment Enr	olled Transfer from Other Appeal	court LJ Vinci
Remanded	Reopened	Joining Suit/Action	i de la companya del companya de la companya de la companya del companya de la co	
	ging Suit Should Be E	ntered First - Enter Add	ditional Plaintiffs on Separate Form	
Individual				
Last Na		First Name	Maiden Name, if applic	•
	ainitiff is acting in capac	ity as Executor(trix) or Adi	ministrator(trix) of an Estate, and enter style	::
Estate of			"" ( The first factor and appear of	
	anitiff is acting in capaci	ity as Business Owner/Ope	erator (d/b/a) or State Agency, and enter ent	dty
D/B/A or Agency		****		
Business Trout Point Lodge, Ltd				
	•		agency - If Corporation, indicate the state w	here incorporated
	nitiff is filing suit in the	name of an entity other th	an the above, and enter below:	
D/B/A				
Address of Plaintiff 189 Trout Po	oint R <b>a</b> ad. <u>Kemptvil</u>	le, NS B0W 1Y0 Cana	ada	
Attorney (Name & Address) Henr	1			MS Bar No. 1774
Check (x) if Individual Fil			3 33002	
	"Free Price	rylus		
Signature of Individual Filing:	<del></del>	**		
Defendant - Name of Defendant	- Enter Ad lition Do	efe dants on Separate	Form	
Individual Handshoe		Doug		к.
Last Na	mp	First Name	Maiden Name, if applica	Able M.I. Jr/Sr/III/IV
			dministrator(trix) of an Estate, and enter sty	
Estate of 345 Carroll	l Avenue, Bay St. Lo	ouis, MS		
Charlet 3 if to dividual Da		), p ; p /c		
Cueck ( x ) ii individual be	fendant is acting in cap	acity as Business Owner/C	perator (d/b/a) or State Agency, and enter	entity:
D/B/A or Agency	fendant is acting in cap	acity as Business Owner/C	perator (d/b/a) or State Agency, and enter	entity:
D/B/A or Agency	efendant is acting in cas	acity as Business Owner/C	perator (d/b/a) or State Agency, and enter	entity: 
D/B/A or AgencyBusiness				
D/B/A or Agency  Business  Enter	legal name of business,	corporation, partnership,	operator (d/b/a) or State Agency, and enter of the state was agency - If Corporation, indicate the state was the above, and enter below:	
D/B/A or Agency  Business  Enter	legal name of business,	corporation, partnership,	agency - If Corporation, indicate the state w	
D/B/A or Agency  Business  Enter  Check ( x ) if Business Defe	legal name of business, endant is acting in the n	corporation, partnership,	agency - If Corporation, indicate the state w	rhere incorporated
D/B/A or Agency  Business  Enter  Check ( x ) if Business Defe  D/B/A  Attorney (Name & Address) - If Know	legal name of business, endant is acting in the n	corporation, partnership, name of an entity other tha	agency - If Corporation, indicate the state w an the above, and enter below:	MS Bar No.
D/B/A or Agency  Business  Enter  Check ( x ) if Business Defe	legal name of business, endant is acting in the n	corporation, partnership, name of an entity other tha Punitive \$	agency - If Corporation, indicate the state w an the above, and enter below: Check ( x ) If child support is	MS Bar No.
D/B/A or Agency  Business  Check ( x ) if Business Defe D/B/A  Attorney (Name & Address) - If Know  Damages Sought: Compensato	legal name of business, endant is acting in the n on	corporation, partnership, name of an entity other tha Punitive \$	agency - If Corporation, indicate the state wan the above, and enter below: Check { x } if child support interests the support interests the support interests the support information in the support in	MS Bar No.  s contemplated as an Issue in this suit.* mation Sheet with this Cover Sheet
D/B/A or Agency  Business  Enter  Check ( x ) if Business Defe  D/B/A  Attorney (Name & Address) - If Know  Damages Sought: Compensato  Nature of Suit (Place an "X" in on	legal name of business, endant is acting in the normal ory \$	corporation, partnership, name of an entity other that Punitive \$	agency - If Corporation, indicate the state wan the above, and enter below:	MS Bar No. s contemplated as an Issue in this suit.* nation Sheet with this Cover Sheet
D/B/A or Agency  Business  Enter Check ( x ) if Business Defe D/B/A  Attorney (Name & Address) - If Know Damages Sought: Compensate  Nature of Suit (Place an "X" in on	legal name of business, endant is acting in the n on ory \$ ne box only)	corporation, partnership, name of an entity other that the punitive \$  *If checked, pl	agency - If Corporation, indicate the state wan the above, and enter below:	MS Bar No. s contemplated as an Issue in this suit.* mation Sheet with this Cover Sheet mation Sheet Possession
D/B/A or Agency  Business  Enter Check ( x ) if Business Deficition D/B/A  Attorney (Name & Address) - If Know Damages Sought: Compensato Nature of Suit (Place an "X" in on Child Custody/Visitation	legal name of business, endant is acting in the norm on \$	Punitive \$  *If checked, pl	agency - If Corporation, indicate the state wan the above, and enter below:  Check ( x ) If child support information of the completed Child Support Information of the child support information of t	MS Bar No.  s contemplated as an Issue in this suit.* mation Sheet with this Cover Sheet  Adverse Possession  Ejectment
D/B/A or Agency  Business  Enter Check ( x ) if Business Deficition D/B/A  Attorney (Name & Address) - If Know Damages Sought: Compensate  Nature of Suit (Place an "X" in on Child Custody/Visitation Child Support	legal name of business, endant is acting in the norm ory \$  be box only)  Accounting Business I	Corporation, partnership, name of an entity other that the provided state of the provide	agency - If Corporation, indicate the state wan the above, and enter below: Check { x } if child support inform    Children/Minors Non-Domestics     Adoption - Contested     Adoption - Uncontested     Consent to Abortion Minor	MS Bar No.  s contemplated as an Issue in this suit.* mation Sheet with this Cover Sheet  Adverse Possession  Ejectment Eminent Domain
D/B/A or Agency  Business  Enter Check ( x ) if Business Defe D/B/A  Attorney (Name & Address) - If Know Damages Sought: Compensate  Nature of Suit (Place an "X" in on Child Custody/Visitation Child Support Contempt	legal name of business, endant is acting in the nory \$  be box only)  Accounting Business In Debt College	Corporation, partnership, name of an entity other that the provided state of the provide	agency - If Corporation, indicate the state wan the above, and enter below:	MS Bar No.  s contemplated as an Issue in this suit.* mation Sheet with this Cover Sheet  Adverse Possession Ejectment Eminent Domain Eviction
D/B/A or Agency  Business  Enter Check ( x ) if Business Deformation D/B/A  Attorney (Name & Address) - If Know Damages Sought: Compensate  Nature of Suit (Place an "X" in on Child Custody/Visitation Child Support Contempt Divorce:Fault	legal name of business, endant is acting in the nory \$  ory \$  be box only)  Accounting Business In the norm Busin	Corporation, partnership, name of an entity other that the principle of th	agency - If Corporation, indicate the state wan the above, and enter below:	MS Bar No.  s contemplated as an Issue in this suit.* mation Sheet with this Cover Sheet  Adverse Possession Ejectment Eminent Domain Eviction Judicial Foreclosure
D/B/A or Agency  Business  Enter Check ( x ) if Business Deficition D/B/A  Attorney (Name & Address) - If Known Damages Sought: Compensate Compensate Child Custody/Visitation Child Support Contempt Divorce: Fault Divorce: Irreconcilable Diff.	legal name of business, endant is acting in the norm of the norm o	Punitive \$  *If checked, pl  s/Coinmercial (Business) Dissolution ection ent	agency - If Corporation, indicate the state wan the above, and enter below:	MS Bar No.  s contemplated as an Issue in this suit.* mation Sheet with this Cover Sheet  Adverse Possession Ejectment Eminent Domain Eviction
D/B/A or Agency  Business  Enter Check ( x ) if Business Defe D/B/A  Attorney (Name & Address) - If Know Damages Sought: Compensate  Nature of Suit (Place an "X" in on Child Custody/Visitation  Child Support Contempt Divorce:Fault Divorce: Irreconcilable Diff. Domestic Abuse	legal name of business, endant is acting in the norm of the norm o	Punitive \$  *If checked, pl  s/Coinmercial (Business) Dissolution ection ent	agency - If Corporation, indicate the state wan the above, and enter below:	MS Bar No.  s contemplated as an Issue in this suit.* mation Sheet with this Cover Sheet  Adverse Possession Ejectment Eminent Domain Eviction Judicial Foreclosure Lien Assertion Partitlon
D/B/A or Agency  Business  Enter Check ( x ) if Business Deficition D/B/A  Attorney (Name & Address) - If Known Damages Sought: Compensate Compensate Child Custody/Visitation Child Support Contempt Divorce: Fault Divorce: Irreconcilable Diff. Domestic Abuse Emancipation	legal name of business, endant is acting in the norm of the norm o	Punitive \$  *If checked, pl  s/Coinmercial (Business) Dissolution ection ent	agency - If Corporation, indicate the state wan the above, and enter below:	MS Bar No.  s contemplated as an Issue in this suit.* mation Sheet with this Cover Sheet  Adverse Possession Ejectment Eminent Domain Eviction Judicial Foreclosure Lien Assertion
D/B/A or Agency  Business  Enter Check ( x ) if Business Deficition D/B/A  Attorney (Name & Address) - If Known Damages Sought: Compensate Compensate Child Custody/Visitation Child Support Contempt Divorce: Fault Divorce: Irreconcilable Diff. Domestic Abuse Emancipation Modification	legal name of business, endant is acting in the norm.  ory \$  be box only    Accounting Business    Debt Collette Employment    Employment Garnishment    Replevin    Other	Punitive \$  Punitive \$  If checked, pl  S/Commercial  Ing (Business) Dissolution ection ent udgment lent	agency - If Corporation, indicate the state wan the above, and enter below:	MS Bar No.  s contemplated as an Issue in this suit.* mation Sheet with this Cover Sheet  Adverse Possession Ejectment Eminent Domain Eviction Judicial Foreclosure Lien Assertion Partition Tax Sale: Confirm/Cancel
Business  Check ( x ) if Business Defe D/B/A  Attorney (Name & Address) - If Know Damages Sought: Compensate Compensate Child Custody/Visitation Child Support Contempt Divorce: Erreconcilable Diff. Domestic Abuse Emancipation Modification Paternity	legal name of business, endant is acting in the norm of the norm o	Punitive \$  *If checked, pl  s/Coinmercial (Business) Dissolution ection ent	agency - If Corporation, indicate the state wan the above, and enter below:	MS Bar No.  s contemplated as an Issue in this suit.* mation Sheet with this Cover Sheet  Adverse Possession Ejectment Eminent Domain Eviction Judicial Foreclosure Lien Assertion Partition Tax Sale: Confirm/Cancel Title Boundary or Easement
D/B/A or Agency  Business  Enter Check ( x ) if Business Deficition D/B/A  Attorney (Name & Address) - If Known Damages Sought: Compensate Compensate Child Custody/Visitation Child Support Contempt Divorce: Fault Divorce: Irreconcilable Diff. Domestic Abuse Emancipation Modification	legal name of business, endant is acting in the norm of the norm o	Corporation, partnership, name of an entity other that the partnership of the partnership	agency - If Corporation, indicate the state wan the above, and enter below:  Check ( x ) If child support inform Children/Minors Non-Domesticis Adoption - Contested Adoption - Uncontested Consent to Abortion Minor Removal of Minority Other Civil Rights Elections Expungement Habeas Corpus Post Conviction Relief/Prisoner Other Other	MS Bar No.  s contemplated as an Issue in this suit.* mation Sheet with this Cover Sheet  Adverse Possession Ejectment Eminent Domain Eviction Judicial Foreclosure Lien Assertion Partitlon Tax Sale: Confirm/Cancel Title Boundary or Easement Other
Business  Check ( x ) if Business Defe D/B/A  Attorney (Name & Address) - If Know Damages Sought: Compensate Compensate Child Custody/Visitation Child Support Contempt Divorce: Irreconcilable Diff. Domestic Abuse Emancipation Modification Paternity Property Division	legal name of business, endant is acting in the norm of the norm o	Punitive \$  *If checked, pl  s/Commercial  g (Business) Dissolution ection ent udgment eent ig (Probate) ificate Correction	agency - If Corporation, indicate the state wan the above, and enter below:	MS Bar No.  s contemplated as an Issue in this suit.* mation Sheet with this Cover Sheet  Adverse Possession Ejectment Eminent Domain Eviction Judicial Foreclosure Lien Assertion Partitlon Tax Sale: Confirm/Cancel Title Boundary or Easement Other
Business  Check ( x ) if Business Defe D/B/A  Attorney (Name & Address) - If Know Damages Sought: Compensate Compensate Child Custody/Visitation Child Support Contempt Divorce: Irreconcilable Diff. Domestic Abuse Emancipation Modification Paternity Property Division Separate Maintenance	legal name of business, endant is acting in the norm of the norm o	Punitive \$  *If checked, pl  s/Commercial  g (Business) Dissolution ection ent udgment eent ig (Probate) ificate Correction eent	agency - If Corporation, indicate the state wan the above, and enter below:	MS Bar No.  s contemplated as an Issue in this suit.* mation Sheet with this Cover Sheet  Adverse Possession Ejectment Eminent Domain Eviction Judicial Foreclosure Lien Assertion Partitlon Tax Sale: Confirm/Cancel Title Boundary or Easement Other Bad Faith
Business    Check ( x ) if Business Deficition	legal name of business, endant is acting in the norm of the norm o	Corporation, partnership, name of an entity other that the partnership of the checked, placed by the checked by the	agency - If Corporation, indicate the state wan the above, and enter below:	MS Bar No.  s contemplated as an Issue in this suit.* mation Sheet with this Cover Sheet  Adverse Possession Ejectment Eminent Domain Eviction Judicial Foreclosure Lien Assertion Partitlon Tax Sale: Confirm/Cancel Title Boundary or Easement Other Bad Faith Fraud
Business  Check ( x ) if Business Defe D/B/A  Attorney (Name & Address) - If Know Damages Sought: Compensate Compensate Child Custody/Visitation Child Support Contempt Divorce: Irreconcilable Diff. Domestic Abuse Emancipation Modification Paternity Property Division Separate Maintenance Termination of Parental Rights UIFSA (eff 7/1/97; formerly URE	legal name of business, endant is acting in the norm of the norm o	Corporation, partnership, name of an entity other that the partnership of the checked, placed by the checked by the	agency - If Corporation, indicate the state wan the above, and enter below:	MS Bar No.  s contemplated as an Issue in this suit.* mation Sheet with this Cover Sheet  Adverse Possession  Epictment  Eminent Domain  Eviction  Judicial Foreclosure  Lien Assertion  Partitlon  Tax Sale: Confirm/Cancel  Title Boundary or Easement  Other  Bad Faith  Fraud  Loss of Consortium  Malpractice - Legal  Malpractice - Medical
Business    Check ( x ) if Business Deficition	legal name of business, endant is acting in the normal section in the normal section in the normal section is acting in the normal section in the normal section is action in the normal section in the normal section is action in the normal section in the normal section is action in the normal section in the normal section in the normal section is action in the normal section in the normal secti	Corporation, partnership, name of an entity other that the partnership of the checked, placed by the checked by the		MS Bar No.  s contemplated as an Issue in this suit.* mation Sheet with this Cover Sheet  Adverse Possession  Eminent Domain  Eviction  Judicial Foreclosure  Lien Assertion  Partitlon  Tax Sale: Confirm/Cancel  Title Boundary or Easement  Other  Bad Faith  Fraud  Loss of Consortium  Malpractice - Legal  Malpractice - Medical  Mass Tort
Business    Enter   Check ( x ) if Business Deficition   D/B/A	legal name of business, endant is acting in the norm of the norm o	Corporation, partnership, name of an entity other that the partnership of the checked, placed by the checked by the checked, placed by the checked by th		MS Bar No.  s contemplated as an Issue in this suit.* mation Sheet with this Cover Sheet  Adverse Possession  Epictment  Eminent Domain  Eviction  Judicial Foreclosure  Lien Assertion  Partitlon  Tax Sale: Confirm/Cancel  Title Boundary or Easement  Other  Bad Faith  Fraud  Loss of Consortium  Malpractice - Legal  Malpractice - Medical  Mass Tort  Negligence - General
Business  Check ( x ) if Business Defe D/B/A  Attorney (Name & Address) - If Know Damages Sought: Compensate C	legal name of business, endant is acting in the norm of the norm o	Punitive \$ Punitive \$ If checked, plus (Business) Dissolution ection ent udgment eent  purple (Probate) ifficate Correction ent torship ship Estate ettlement		MS Bar No.  s contemplated as an Issue in this suit.* mation Sheet with this Cover Sheet  Adverse Possession  Epictment  Eminent Domain  Eviction  Judicial Foreclosure  Lien Assertion  Partitlon  Tax Sale: Confirm/Cancel Title Boundary or Easement  Other  Bad Faith  Fraud  Loss of Consortium  Malpractice - Legal  Malpractice - Medical  Mass Tort  Negligence - General  Negligence - Motor Vehicle
Business  Enter   Check ( x ) if Business Defe   D/B/A  Attorney (Name & Address) - If Know   Damages Sought: Compensate   Nature of Suit (Place an "X" in on   Child Custody/Visitation   Child Support   Contempt   Divorce: Fault   Divorce: Fault   Divorce: Irreconcilable Diff.   Domestic Abuse   Emancipation   Modification   Paternity   Property Division   Separate Maintenance   Termination of Parental Rights   UIFSA (eff 7/1/97; formerly URE   Other   Administrative Agency   County Court   Hardship Petition (Driver License   Justice Court	legal name of business, endant is acting in the norm of the norm o	Punitive \$ Punitive \$ If checked, place   Punitive   Pu	agency - If Corporation, indicate the state wan the above, and enter below:	MS Bar No.  s contemplated as an Issue in this suit.* mation Sheet with this Cover Sheet  Adverse Possession  Epictment  Eminent Domain  Eviction  Judicial Foreclosure  Lien Assertion  Partitlon  Tax Sale: Confirm/Cancel  Title Boundary or Easement  Other  Bad Faith  Fraud  Loss of Consortium  Malpractice - Legal  Malpractice - Medical  Mass Tort  Negligence - General  Negligence - Motor Vehicle  Product Liability
Business  Enter   Check ( x ) if Business Defe   D/B/A  Attorney (Name & Address) - If Know   Damages Sought: Compensate   Nature of Suit (Place an "X" in on   Child Custody/Visitation   Child Support   Contempt   Divorce:Fault   Divorce:Fault   Divorce:Irreconcilable Diff.   Domestic Abuse   Emancipation   Modification   Paternity   Property Division   Separate Maintenance   Termination of Parental Rights   UIFSA (eff 7/1/97; formerly URE   Other   Administrative Agency   County Court   Hardship Petition (Driver Licensi   Justice Court   MS Dept Employment Security	legal name of business, endant is acting in the norm or \$  le box only)    Business   Accountin   Business   Debt Colle   Employm   Replevin   Other   Accountin   Birth Cert   Commitm   Commitm   Guardians   Heirship   Intestate   Minor's See   Muniment   Name Challet   Testate Es	Punitive \$ Punitive \$ If checked, place   Punitive   Pu	agency - If Corporation, indicate the state wan the above, and enter below:	MS Bar No.  s contemplated as an Issue in this suit.* mation Sheet with this Cover Sheet  Adverse Possession  Ejectment  Eminent Domain  Eviction  Judicial Foreclosure  Lien Assertion  Partitlon  Tax Sale: Confirm/Cancel  Title Boundary or Easement  Other  Bad Faith  Fraud  Loss of Consortium  Malpractice - Legal  Malpractice - Medical  Mass Tort  Negligence - General  Negligence - Motor Vehicle  Product Liability  Subrogation
Business  Enter   Check ( x ) if Business Defe   D/B/A  Attorney (Name & Address) - If Know   Damages Sought: Compensate   Nature of Suit (Place an "X" in on   Child Custody/Visitation   Child Support   Contempt   Divorce: Fault   Divorce: Fault   Divorce: Irreconcilable Diff.   Domestic Abuse   Emancipation   Modification   Paternity   Property Division   Separate Maintenance   Termination of Parental Rights   UIFSA (eff 7/1/97; formerly URE   Other   Administrative Agency   County Court   Hardship Petition (Driver License   Justice Court	legal name of business, endant is acting in the norm of the norm o	Punitive \$ Punitive \$ If checked, place   Punitive   Pu	agency - If Corporation, indicate the state wan the above, and enter below:	MS Bar No.  s contemplated as an Issue in this suit.* mation Sheet with this Cover Sheet  Adverse Possession  Epictment  Eminent Domain  Eviction  Judicial Foreclosure  Lien Assertion  Partitlon  Tax Sale: Confirm/Cancel  Title Boundary or Easement  Other  Bad Faith  Fraud  Loss of Consortium  Malpractice - Legal  Malpractice - Medical  Mass Tort  Negligence - General  Negligence - Motor Vehicle  Product Liability

# Case 1:12-cv-00038-HSO-RHW Document 6 Filed 04/03/12 Page 35 of 39

IN THE (	CIRCUIT C	OURT OF HANCOCK	COUNTY, MIS	SISSIPPI
		JUDICIAL DISTRIC	r, CITY OF	***************************************
Docket No			Docket No. If Filed Prior to 1/1/94	
I IN ADD	PLAINTIFFS IN REFE NITION TO PLAINTIFF	RENCED CAUSE - SHOWN ON CIVIL	Page 1 of Plaintiffs Pages CASE FILING FORM COVER	SHEET
Plaintiff #2:				
Individual: Perret	st Name Vau	ighn First Name	( Maiden Name, if Applicable )	Middle Init. Jr/Sr/III/IV
			or Administrator(trix) of an Estate, a	and enter style:
	t Road, Kemptville, NS)			
Check ( / ) if Individual	Plaintiff is acting in capa	acity as Business Own	er/Operator (D/B/A) or State Agenc	y, and enter that name below
D/B/A				<u> </u>
BusinessEnter le	egal name of business, corporat	ion, partnership, agency - If C	corporation, indicate state where incorporated	
Check (/) if Business I	Plaintiff is filing suit in the	e name of an entity oth	er than the name above, and enter	below:
ATTORNEY FOR THIS PLAINT	FF: <u>1774</u> Bar # or Na	ame: Henry Laird	Pro Hac Vice (✔)	Not an Attorney( )</td
Plaintiff #3:				
Individual: Leary	Cha	irles	(( Maiden Name, if Applicable)	Middle Init. Jr/Sr/UI/IV
			or Administrator(trix) of an Estate, a	
Check (🗸) if Individual	Plaintiff is acting in capa	acity as Business Own	er/Operator (D/B/A) or State Agend	y, and enter that name below
Business	name of business cornoral	ion partoership agency - If C	corporation, indicate state where incorporated	
Check (✓) if Business F	Plaintiff is filing suit in the	e name of an entity oth	er than the name above, and enter	below:
D/B/A				
ATTORNEY FOR THIS PLAINT	FF: <u>1774</u> Bar # or Na	ame: <u>Henry Laird</u>	Pro Hac Vice (✔)_	Not an Attorney(✓)
Plaintiff #4:				
Individual:		First Name	( Maiden Name, if Applicable	Middle Init. Jr/Sr/littiV
			or Administrator(trix) of an Estate, a	
Estate of		•		
	Plaintiff is acting in capa	acity as Business Own	er/Operator (D/B/A) or State Agenc	y, and enter that name below
D/B/A				
Business	and name of husiness cornorate	ion partnership agency - IFC	orporation, indicate state where incorporated	
			er than the name above, and enter	
			Pro Hac Vice (✓)	Not an Attorney(/)



Lauyers at Watkins Ludlam Winter & Stennis, P.A. joined the law firm of Jones Walker effective November 5, 2011, and will continue to provide legal services under the name of Jones Walker.

Henry F. Laird Not admitted in Alabama hlaird@joneswalker.com

March 8, 2012

Karen Ladner Ruhr Circuit Court Clerk 152 Main Street, Suite B Bay St. Louis, Mississippi 39520 FILED

MAR 0 8 2012

CIRCUT CLERK, HANCOCK CO. BY D.C.

RE: Trout Point Lodge, Limited, a Nova Scotia Limited Company; Vaughn Perret and Charles Leary v. Doug K. Handshoe

Dear Ms. Ruhr:

Enclosed for filing please find the following:

- 1. Civil Cover Sheet and check in the amount of \$120.00 which represents payment of your filing fee;
- 2. Motion to Enroll Foreign Judgment;
- 3. Clerk's Notice of Filing Foreign Judgment.

I have attached extra copies of the aforementioned documents which I would appreciate your returning stamped "filed".

Henry F. Na

HFL Enclosures FEE BILL, CIVIL CASES, CIRCUIT COURT

State of Mississippi Hancock County

TROUT POINT LODGE, LIMITED ET AL VS HANDSHOE, DOUG K.

Case # 12-0103	Acct #	Paid By CHECK	302032	Rct#	25192
***************************************	CLERK'S FEES	V ALL DAY (AND EAST EAST (AND EAST AND EAST AND EAST EAST	85.00		
	JURY TAX		3.00		
	COURT REPORTERS FEE		10.00		
	LAW LIBRARY		2.50		
	COURT ADMINISTRATOR		2.00		
	STATE CT ED FUND		2.00		
	COURT CONSTITUENTS		.50		
	ELECTRONIC COURT		10.00		
	LEGAL ASSISTANCE		5.00		

Total \$ 120.00

FOREIGN JUDGMENT

Payment received from Henry Laird

PO Drawer 160 2510 14th St. Suite 1010

Gulfport MS 39502

Transaction 21863 Received 3/8/2012 at 13:49 Drawer 1 I.D. KATHARINE

Current Balance Due \$0.00

Receipt Amount \$ 120.00

D.C. Karen Ladner Ruhr, Circuit Clerk

Batch Print Documents Case Num Entling D Entry Da Report ID CASE Case Number Filing 12-0103 3/8 12-0103 3/8 12-0103 3/8 12-0103 3/8 12-0103 3/8 12-0103 3/8 12-0103 3/8 12-0103 3/8 12-0103 3/8 12-0103 3/8 12-0103 3/8 12-0103 3/8 12-0103 3/8 12-0103 3/8 12-0103 3/8 12-0103 3/8 12-0103 3/8 12-0103 3/8	KATHARINE M
Batch Print Documents for:  Case Number 12-0103  Filing Date / Entry Date / Entry Date / Entry Date / 12-0103 3/ 8/2012 12-0103 3/ 8/2012 12-0103 3/ 8/2012 12-0103 3/ 8/2012 12-0103 3/ 8/2012 12-0103 3/ 8/2012 5 Total Pages Printed 36	KATHARINE MCMPRT10 03/28/2012 11:31
2-010	2012
M C M C M C M C M C M C M C M C M C M C	3
thru 12-0103 thru / thr	MCR4 Circ
2-0103 / / / lin exec men ce	mic o
/ / / Sintry Date 3/26/2012 3/20/2012 3/12/2012 3/8/2012 3/8/2012	MCR4 Circuit Court System
ה בו א ס מ מ מ	
MS23CC MS23CC MS23CC MS23CC MS23CC	
AEV00119119994 AEV00119119995 AEV00119119996 AEV00119119997	